

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

United States of America
ex rel. ALEX DOE, Relator,

The State of Texas
ex rel. ALEX DOE, Relator,

The State of Louisiana
ex rel. ALEX DOE, Relator,
Plaintiffs,
v.

Defendants.

CIVIL ACTION NO. 2:21-CV-
00022-Z

Date: October 20, 2022

**AFFILIATE DEFENDANTS' SECOND AND RENEWED
MOTION TO COMPEL THE STATE OF TEXAS**

Defendants Planned Parenthood Gulf Coast (“PPGC”), Planned Parenthood of Greater Texas, Inc. (“PPGT”), Planned Parenthood South Texas, Inc. (“PPST”), Planned Parenthood Cameron County, Inc. (“PP Cameron County”), and Planned Parenthood San Antonio, Inc. (“PP San Antonio”) (collectively “Affiliate Defendants”) move the Court pursuant to Federal Rule of Civil Procedure (“FRCP”) 37 for an order overruling discovery objections asserted by the State of Texas (“Texas”) and compelling the production of complete written responses and responsive documents in response to Affiliate Defendants’ First Interrogatories and First Set of Requests for Production.

WHEREFORE, Affiliate Defendants respectfully move that this Honorable Court: (1) order Texas to respond as to Interrogatories 4-7, 9, 14, 15, and substantially complete its

production of documents responsive to Requests for Production 3, 4, 6, 9-13, 15-18, 24, 33-35, 37-39, and 41-43 within seven (7) days; and (2) order Texas to search the custodial data of David Maxwell and produce within ten (10) days all responsive documents that it is currently withholding on the basis of the Medicaid investigative and common interest privileges.

Dated: October 20, 2022

Respectfully submitted,

ARNOLD & PORTER KAYE SCHOLER
LLP

By: /s/ Tirzah S. Lollar
Craig D. Margolis
Craig.Margolis@arnoldporter.com
Tirzah S. Lollar
Tirzah.Lollar@arnoldporter.com
Christian Sheehan
Christian.Sheehan@arnoldporter.com
Emily Reeder-Ricchetti
Emily.Reeder-Ricchetti@arnoldporter.com
Megan Pieper
Megan.Pieper@arnoldporter.com
Alyssa Gerstner
Alyssa.Gerstner@arnoldporter.com
601 Massachusetts Ave, NW
Washington, DC 20001-3743
Telephone: +1 202.942.5000
Fax: +1 202.942.5999

Christopher M. Odell
Texas State Bar No. 24037205
Christopher.Odell@arnoldporter.com
700 Louisiana Street, Suite 4000
Houston, TX 77002-2755
Telephone: +1 713.576.2400
Fax: +1 713.576.2499

Paula Ramer
250 West 55th Street
New York, New York 10019-9710
T: +1 212.836.8474
Paula.Ramer@arnoldporter.com

Ryan Patrick Brown

Texas State Bar No. 24073967
brown@blackburnbrownlaw.com
1222 S. Filmore
Amarillo, TX 79101
Tel: (806) 371-8333
Fax: (806) 350-7716

*Attorneys for Defendants Planned Parenthood
Gulf Coast, Inc., Planned Parenthood of
Greater Texas, Inc., Planned Parenthood of
South Texas, Inc., Planned Parenthood
Cameron County, Inc., and Planned
Parenthood San Antonio, Inc.*

CERTIFICATE OF SERVICE

I hereby certify that on October 20, 2022, the foregoing document was electronically filed with the Clerk of Court using CM/ECF.

/s/ Tirzah S. Lollar

Tirzah S. Lollar